

Shapiro, DiCaro & Barak, LLC

175 Mile Crossing Boulevard
Rochester, New York 14624
Phone: (585)-247-9000
FAX (585) 247-7380

December 28, 2018

Honorable Robert D. Drain
United States Bankruptcy Court
300 Quarropas St
White Plains, NY 10601

RE: Sears Holdings Corporation
Chapter 11
Case Number: 18-23538
SD&B File Number: 10-005523

Dear Judge Drain:

Please find the attached Memorandum of Law in support of the Motion for Relief which was filed by Wells Fargo Bank, N.A. as servicer for Deutsche Bank National Trust Company, as Trustee for Fremont Home Loan Trust 2006-1, Asset-Backed Certificates, Series 2006-1 on December 28, 2018 under (ECF 1,443).

If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,



Michael J. Chatwin

cc: Debtor
Sears Holdings Corporation
3333 Beverly Road
Hoffman Estates, IL 60179

Co-Debtors
Bradley Rutty
845 East 219th Street
Bronx, NY 10467

Lorna Rutty
845 East 219th Street
Bronx, NY 10467

ATTORNEYS AT LAW

Attorney for Debtor
Jacqueline Marcus
767 5th Ave
New York, NY 10153

Creditors
The Pension Benefit Guaranty Corporation
Attn.: Office of the Chief Counsel
1200 K Street, N.W., Suite 300
Washington, DC 20005

SRAC Medium Term Notes
c/o BNY Midwest Trust Company Attn.: President or General Counsel
101 Barclay St., Floor 8W
New York, NY 10286

Holdings Unsecured Notes (8.00%)
c/o Computershare Trust Company, N.A. Attn.: President or General Counsel
250 Royal Street
Canton, MA 02021

SRAC Unsecured Notes
c/o The Chase Manhattan Bank, N.A. Attn.: Corporate Trust Department
4 Chase MetroTech Center, 3rd Floor
Brooklyn, NY 11245

Whirlpool Corporation
Attn.: President or General Counsel
2000 North M-63
Benton Harbor, MI 49022

Winia Daewoo Electronics America
Attn.: President or General Counsel
65 Challenger Road, Suite 360
Ridgefield Park, NJ 07660

Frigidaire Company
c/o Electrolux Attn.: President or General Counsel
P.O. Box 2638
Carol Stream, IL 60132

Cardinal Health
Attn.: President or General Counsel
7000 Cardinal Place
Dublin, OH 43017

Icon Health and Fitness Inc.
Attn.: President or General Counsel
1500 South 1000 West
Logan, UT 84321

HK Greatstar Int'l Co. Ltd.
Attn.: President or General Counsel
23 Hing Yip Street, Rm 35, 4/F., Po Yip Building
Kwun Tong,

Samsung Electronics America HA
Attn.: President or General Counsel
85 Challenger Road, 7th Floor
Ridgefield Park, NJ 07660

Apex Tool International LLC
Attn.: President or General Counsel
910 Ridgebrook Road, Suite 200
Sparks, MD 21152

Black & Decker US Inc.
c/o Stanley Black & Decker Attn.: President or General Counsel
1000 Stanley Drive
New Britain, CT 06053

Eastern Prime Textile Limited
Attn.: President or General Counsel
No. 65-67 King Yip Street, Unit F10/F, King Win FTY Building
Kwun Tong,

Winners Industry Company Limited
Attn.: President or General Counsel
49-53 Wang Lung Street, Unit A, Wah Lung Building
Tsuen wan,

Tata Consultancy Services Ltd.
Attn.: President or General Counsel
379 Thornal Street, 4th Floor
Edison, NJ 08837

Active Media Services Inc.
Attn.: President or General Counsel
1 Blue Hill Plaza
Pearl River, NY 10965

Automotive Rentals Inc.
Attn.: President or General Counsel
4001 Leadenhall Road
Mount Laurel, NJ 08054

Prime Clerk, LLC
830 Third Avenue
9th Floor
New York, NY 10022

Official Committee of Unsecured Creditors of Sears Holdings Corporation, et al.
c/o Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036

SRAC Unsecured PIK Notes
c/o BNY Midwest Trust Company Attn.: President or General Counsel
101 Barclay Street, Floor 8W
New York, NY 10286

Holdings Unsecured PIK Notes (8.00%)
c/o Comoutershare Trust Company, N.A. Attn: President or General Counsel
250 Royal Street
Canton, MA 02021

Frejka PLLC
420 Lexington Avenue
New York, NY 10170